

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

**FELIPE DE JESUS AVILA-SOTO,  
AND OTHERS SIMILARLY  
SITUATED**

**No: 6:24-cv-01392**

**JUDGE ROBERT R. SUMMERHAYS**

**V.**

**MAGISTRATE JUDGE CAROL B.  
WHITEHURST**

**SOUTH CENTRAL SUGAR CANE  
GROWERS' ASSOCIATION AND  
STERLING SUGARS, LLC**

**MOTION TO WITHDRAW MARCELLUS D. CHAMBERLAIN  
AS COUNSEL OF RECORD**

**NOW INTO COURT**, through undersigned counsel, comes Defendants South Central Sugar Cane Growers' Association and Sterling Sugars, LLC ("Defendants"), who respectfully move this Honorable Court to withdraw Marcellus D. Chamberlain (MB# 105672) who was admitted *Pro Hac Vice* to represent the Defendants. Marcellus D. Chamberlain is no longer with the law firm of Phelps Dunbar LLP. This matter is set for trial on August 3, 2026 and this withdrawal of counsel will not delay the proceedings. Brandon Davis, Caroline Perlis, Jennifer Clewis Thomas and Molly McDiarmid, of the law firm of Phelps Dunbar, LLP will remain as counsel for Defendants. Marcellus D. Chamberlain does not oppose the withdrawal as counsel in this matter.

**WHEREFORE** Defendants prays that this Motion be granted, and that Marcellus D. Chamberlain be withdrawn as counsel of record for Defendants, South Central Sugar Cane Growers' Association and Sterling Sugars, LLC.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ Brandon Davis  
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SOUTH CENTRAL SUGAR CANE  
GROWERS' ASSOCIATION AND  
STERLING SUGARS, LLC

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**ORDER**

Considering the foregoing Motion Withdraw as Counsel of Record filed by Defendants, South Central Sugar Cane Growers' Association and Sterling Sugars, LLC., accordingly,

**IT IS HEREBY ORDERED** that Defendants' Motion to Withdraw as Counsel of Record is hereby **GRANTED**, and that Marcellus D. Chamberlain, who was admitted *Pro Hac Vice*, is withdrawn as counsel of record for Defendants, South Central Sugar Cane Growers' Association and Sterling Sugars, LLC.

New Orleans, Louisiana, this \_\_\_\_ day of \_\_\_\_\_, 2025.

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UNITED STATES DISTRICT JUDGE